

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
FORREST ANDRE PARKER SR.)	Case No. 21-31527-KRH
)	Chapter 13
Debtor)	

MOTION TO SELL REAL ESTATE

COMES NOW, the Debtor, by counsel, and as and for Debtor's Motion to Sell Real Estate, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on May 7, 2021.

2. Statebridge Company LLC ("Statebridge") is a secured creditor which holds a first mortgage on the property known as 26640 Laurel Grove Court, Mechanicsville, MD 20659, more particularly known as

Being known and designated Lot Numbered Twenty-Six (26), containing 2.24 acres, more or less, as shown on plat entitled "Laurel Grove Estates" and recorded among the Plat Records of St. Mary's County, Maryland at Liber No. 34 and Folio 101 and recorded at Liber No. 24, folio 119. The improvements thereon being known as 26640 Laurel Grove Estates, Mechanicsville, Maryland 20659.

(the "Property").

3. The approximate payoff balance on the note secured by said mortgage is \$311,085.00. The tax assessed value of the Property is \$277,167.00.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

4. Statebridge has agreed to short sale the Property for \$282,000.00 to Diane Parker, a relative of the Debtor, which, upon closing of the same, will result in Statebridge releasing its deed of trust against the Property. A copy of said Agreement is attached hereto as Exhibit "A" and incorporated herein by this reference.

5. The Debtor will receive no cash or proceeds from the closing, escrow, or closing of the Property.

6. On May 31, 2021, or as soon thereafter as may be practicable, Debtor intends to sell his interest in the Property in accordance with the terms of the Agreement.

WHEREFORE, the Debtor requests that the Court enter an Order authorizing the short sale of the Property in accordance with the terms of the Agreement and for such other relief as the Court may deem appropriate

Dated: May 21, 2021

FORREST ANDRE PARKER SR.

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof, and I mailed a true and exact copy to the parties on the list attached hereto.

/s/ James E. Kane
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
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IN RE:)	
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FORREST ANDRE PARKER SR.)	Case No. 21-31527-KRH
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NOTICE OF MOTION AND HEARING

The above Debtor has filed a Motion to Sell Real Estate with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

The property Debtor is requesting to sell Debtor's real estate known as 26640 Laurel Grove Court, Mechanicsville, MD 20659. The Debtor is seeking approval of the short sale of 26640 Laurel Grove Court, Mechanicsville, MD 20659 for \$282,000.00. The property is currently secured by a first deed of trust with an approximate balance of \$311,085.00 which lien will be released and a satisfaction of mortgage will be filed within 90 days of the sale. The Debtor will receive no proceeds from the sale.

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then within twenty-one (21) days from the date of this Notice, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **May 26, 2021 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: May 21, 2021

FORREST ANDRE PARKER SR

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

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/s/ James E. Kane
Counsel for Debtor

Label Matrix for local noticing

0422-3

Case 21-31527-KRH

Eastern District of Virginia

Richmond

Fri May 21 11:18:47 EDT 2021

Ashley Funding Services

P. O. Box 10587

Greenville, SC 29603-0587

Lee's Hill Community Association, Inc

MercerTrigiani LLP

112 South Alfred Street

Alexandria, VA 22314-3061

BB&T/Truist

Attn: Bankruptcy

Po Box 1847

Wilson, NC 27894-1847

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

Bsi Financial Services

Attn: Bankruptcy

P.O Box 517

Titusville, PA 16354-0517

Chase Mortgage

Chase Records Center/Attn: Correspondenc

Mail Code LA4 5555 700 Kansas Ln

Monroe, LA 71203-0000

DEPARTMENT OF THE TREASURY-IRS

INTERNAL REVENUE SERVICE

PO BOX 7346

PHILADELPHIA, PA 19101-7346

Diane Parker

26640 Laurel Grove Court

Mechanicsville, MD 20659-4472

Division of Child Support

730 E. Broad Street, 4th Floor

Richmond, VA 23219-1861

Internal Revenue Service

Centralized Insolvency Operati

P. O. Box 7346

Philadelphia, PA 19101-7346

Lee's Hill Community Assoc.

9901 Old Dominion Pkwy

Fredericksburg, VA 22408-9570

MercerTrigiani

112 S Alfred St.

Alexandria, VA 22314-3061

Omega Exterior Restoration Inc

25686 Grandiflora Ct

Mechanicsville, MD 20659-4921

Retina Institute of VA

8700 Stony Point Pkwy

Suite 150

Richmond, VA 23235-1963

Robertson, Anschutz, Schneid,

11900 Parklawn Drive

Suite 310

Rockville, MD 20852-2893

TACS

P O Box 31800

Henrico, VA 23294-1800

US Attorney

Suntrust Building

919 East Main Street, Suite 1900

Richmond, VA 23219-4622

VA Dept. of Taxation

Office of Customer Services

PO Box 1115

Richmond, VA 23218-1115

Virginia Credit Union

Attn: Bankruptcy

Po Box 90010

Richmond, VA 23225-9010

Forrest Andre Parker Sr.

9811 Fendale Lane

Fredericksburg, VA 22408-9529

James E. Kane

Kane & Papa, PC

1313 East Cary Street

P.O. Box 508

Richmond, VA 23218-0508

John P. Fitzgerald, III

Office of the US Trustee - Region 4 -R

701 E. Broad Street, Ste. 4304

Richmond, VA 23219-1849

Suzanne E. Wade

341 Dial 877-996-8484 Code 2385911

7202 Glen Forest Drive, Ste. 202

Richmond, VA 23226-3770

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)JPMorgan Chase Bank, National Association

(u)Personal property taxes??

End of Label Matrix

Mailable recipients 23

Bypassed recipients 2

Total 25